

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

**UNITED STATES OF AMERICA**

**v.**

**STEVEN TSAITSIOS**

No. 1:24-cr-00097-LEW

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

(Attempt to Transfer Obscene Material to a Minor)

On about June 13, 2023, in the District of Maine and elsewhere, the defendant,

**STEVEN TSAITSIOS**

used a facility or means of interstate commerce to knowingly attempt to transfer obscene matter to an individual who the defendant believed had not attained the age of sixteen years by sending an obscene image over the internet to an undercover agent posing as thirteen-year-old female.

All in violation of Title 18, United States Code, Section 1470.

**COUNT TWO**

(Attempt to Transfer Obscene Material to a Minor)

On about June 20, 2023, in the District of Maine and elsewhere, the defendant,

**STEVEN TSAITSIOS**

used a facility or means of interstate commerce to knowingly attempt to transfer obscene matter to an individual who the defendant believed had not attained the age of sixteen years, that is by sending an obscene image over the internet to an undercover

agent posing as thirteen-year-old female.

All in violation of Title 18, United States Code, Section 1470.

**FORFEITURE NOTICE**

Upon conviction of the offense in violation of Title 18, United States Code, Section 1470, set forth in Counts One and Two of this Indictment, the defendant,

**STEVEN TSAITSIOS**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1467:


(1) any obscene material produced, transported, mailed, shipped, or received as alleged in Count One; (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense alleged in Count One; and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of the offense alleged in Count One including, but not limited to:

a. Black Apple iPhone

All pursuant to Title 18, United States Code, Section 1467.

A TRUE BILL,

Date: 8/14/24

  
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(Assistant) United States Attorney

Signature Redacted – Original on file  
with the Clerk's Office